

# COVINGTON

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January 27, 2017

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: Objection to Disclosure of Confidential Information to Aviation Spectrum Resources, Inc.  
IB Docket Nos. 11-109 & 12-340;  
IBFS File Nos. SES-MOD-20151231-00981, SAT-MOD-20151231-00090, and  
SAT-MOD-20151231-00091**

Dear Ms. Dortch:

Ligado Networks LLC, by undersigned counsel, hereby objects to the disclosure of Ligado's Confidential Information to Outside Counsel to Aviation Spectrum Resources, Inc. ("ASRI"). The Confidential Information filed in these dockets relates to technical analyses regarding Ligado's proposed ancillary terrestrial component ("ATC") user terminal operations at 1627.5-1637.5 MHz and what, if any, effect such operations might have on Iridium's operations in an adjacent part of the "Big LEO Band" at 1617.775-1626.5 MHz. ASRI's request for access to Ligado's Confidential Information<sup>1</sup> offers no indication of what relevance this information would have to ASRI or how the information would contribute to ASRI's submission of material comments in this proceeding.

Accordingly, to preserve its rights under the Protective Order,<sup>2</sup> Ligado objects to ASRI's request. Pursuant to Paragraph 7 of the Protective Order, a copy of this objection is being delivered to ASRI's Outside Counsel by electronic mail.

Please direct any questions to the undersigned.

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<sup>1</sup> See Letter from Edward A. Yorkgitis, Jr., Outside Counsel to ASRI, to Marlene H. Dortch, FCC Secretary, IB Docket No. 12-340 *et al.* (Jan. 24, 2017).

<sup>2</sup> *LightSquared Request to Modify Its ATC Authorization; LightSquared Technical Working Group Report*, Protective Order, IB Docket Nos. 12-340 & 11-109, DA 16-1134 (rel. October 4, 2016) ("Protective Order").

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Sincerely,

/s/

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Gerard J. Waldron  
*Counsel to Ligado Networks LLC*